

## REMARKS

Reconsideration of this application is respectfully requested.

Claims 1-7, and 9-10 are currently pending in the present application. In the Office Action, the Examiner rejected the Claims as follows. Claims 1 and 6-7 were rejected under 35 U.S.C. §102(e) as being anticipated by *McConnell et al.* (U.S. Patent No. 6,944,150). Claims 2-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over *McConnell* in view of *Brunner et al.* (U.S. Patent No. 5,771,275). Claims 9-10 were rejected under 35 U.S.C. §102(e) as being anticipated by *Haskel et al.* (U.S. Patent Publication 2001/0036172 A1) in view of *Chang et al.* (U.S. Patent No. 7,062,265).

Regarding the Examiner's rejection of independent Claim 1, the Examiner states that *McConnell* teaches each and every limitation of Claim 1. More specifically, the Examiner states that *McConnell* teaches a mediation gateway connected to the RAN, for performing an IP registration for the circuit network terminal, as recited in Claim 1. After reviewing *McConnell*, Applicant respectfully disagrees.

Claim 1 includes the recitation of an access gateway connected to the mediation gateway via a predetermined signaling interface. It is stated that the access gateway, as recited by Claim 1, is disclosed by the WAG (60), as taught by *McConnell*, and the mediation gateway, as recited by Claim 1, is disclosed by the trunk gateway (64), as taught by *McConnell* (e.g., see, Office Action, pp. 3-4). However, with reference to FIG. 2 of *McConnell*, a predetermined signaling interface connecting the trunk gateway (64) to the WAG (60) is not disclosed. Here, it is unclear how the WAG (60) and the trunk (64), as taught by *McConnell*, disclose two separate and distinguishable elements (i.e., a mediation gateway and an access gateway) that are connected via a signaling interface, as

recited by Claim 1. Accordingly, *McConnell* does not teach or suggest the recitation of an access gateway connected to the mediation gateway via a predetermined signaling interface, as recited by Claim 1.

Furthermore, Claim 1 includes the recitation of a radio access network (RAN) for providing a call service to the circuit network terminal and a mediation gateway connected the RAN via a predetermined signaling interface. In his rejection, the Examiner refers to FIG. 2 of *McConnell* and states that the BTS, BSC and WAG together anticipate the RAN as recited in Claim 1. Thereafter, the Examiner states that the mediation gateway connected to the RAN, as recited by Claim 1, is anticipated by the WAG, as taught by *McConnell* (e.g., see, Response to Arguments section of the Office Action at pp 9-10). However, it is unclear again how the WAG, as taught by *McConnell*, discloses two separate and distinguishable elements that are connected via a signaling interface. Moreover, to support his rejection of the predetermined signaling interface which connects the mediation gateway to the RAN, the Examiner apparently relies upon the signaling channels (68), (72), and (76), as illustrated in FIG. 2 of *McConnell*. However, with respect to signaling channels (68), (72), and (76), these channels are not connected to the BSC or BTS (which the Examiner relies upon, at least in part, to disclose the RAN, as recited by Claim 1). Accordingly, *McConnell* does not teach or suggest a mediation gateway connected to the RAN via a predetermined signaling interface, as recited by Claim 1.

Moreover, as stated in the previous Response, the mediation gateway of the present application, as recited in the Claims, generally performs two functions i.e., mobility management and IP registration of the circuit network terminal. However, as taught by *McConnell*, the gateway merely provides a function of converting traffic transmitted/received among a wireless communication system including a registered

mobile station, a packet network and a PSTN (Trunk Gateway) into traffic suitable for the corresponding network (system).

In addition, *McConnell* teaches providing services in a communications network. More specifically, although *McConnell* teaches a wireless access gateway (WAG) for communicating with a packet switched network, *McConnell* teaches the WAG functions to convert between signals suitable for communication with a wireless communication system and signals suitable for communication with a packet network (e.g., see, Column 8, Lines 5-20), *McConnell* does not teach or suggest a mediation gateway connected to the RAN, for performing an IP registration for the circuit network terminal, as recited in Claim 1.

Accordingly, as *McConnell* does not teach or suggest each and every limitation of Claim 1, it is respectfully requested that the rejection under 35 U.S.C. §102(e) of Claim 1 be withdrawn.

Regarding the Examiner's rejection of independent Claim 9 under 35 U.S.C. §103(a), the Examiner acknowledges that *Haskal* fails to teach or suggest a call origination message. However, the Examiner uses *Chang* to cure this deficiency. After reviewing the cited references, Applicant respectfully disagrees. First, as *Haskal* fails to teach or suggest a call origination message, *Haskal* cannot teach or suggest receiving a packet voice call origination request at a mediation gateway from the circuit network terminal through a radio access network (RAN) via a circuit-based network interface, as recited in Claim 9. Moreover, with reference to step 60 of FIG. 3, and the corresponding text, *Chang* merely teaches receiving a call origination or termination setup request at an MSC (Mobile Switching Center) or an M-IP/GPRS (Mobile-Internet Protocol/Global Packet Radio Service) system. However, *Chang* does not teach or suggest the recitation

of receiving a packet voice call origination request at a mediation gateway from the circuit network terminal through a radio access network (RAN) via a circuit-based network interface, as recited in Claim 9.

Accordingly, as *Haskal* does not cure the deficiencies of *Chang*, the Applicant respectfully requests that the rejection of Claim 9 under 35 U.S.C. §103(a) be withdrawn.

Regarding the Examiner's rejection of independent Claim 10 under 35 U.S.C. §103(a), Claim 10 includes similar recitations as contained in Claim 9. Namely, Claim 10 includes the recitation of requesting a call termination at the circuit network terminal to a mediation gateway by the packet-based network, which the Examiner states is taught by the combination *Haskal* and *Chang*. More particularly, the Examiner acknowledges that *Haskal* does not teach or suggest a call termination request, as recited by Claim 10, and uses step 60 of FIG. 3 of *Chang* to cure this deficiency. First, as *Haskal* does not teach or suggest a call termination request, *Haskal* cannot teach or suggest the recitation of requesting a call termination at the circuit network terminal to a mediation gateway by the packet-based network. Moreover, with reference to step 60 of FIG. 3, *Chang* merely teaches receiving a call origination or termination setup request at an MSC or an M-IP/GPRS system. However, *Chang* does not teach or suggest requesting a call termination at the circuit network terminal to a mediation gateway by the packet-based network, as recited by Claim 10.

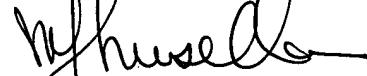
Accordingly, in light of the above-stated arguments, it is respectfully requested that the rejection of Claim 10 under 35 U.S.C. §103(a) be withdrawn.

Independent Claims 1, 9, and 10 are believed to be in condition for allowance. Without conceding the patentability per se of dependent Claims 2-7, these are likewise

believed to be allowable by virtue of their dependence on their respective independent claims. Accordingly, reconsideration and withdrawal of the rejections of dependent Claims 2-7 is respectfully requested.

Accordingly, all of the claims pending in the Application, namely, Claims 1-7 and 9-10, are believed to be in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicant's attorney at the number given below.

Respectfully submitted,



Michael J. Musella

Reg. No. 39,310

Attorney for Applicant

**THE FARRELL LAW FIRM, P.C.**  
333 Earle Ovington Blvd.  
Uniondale, New York 11553  
Tel: (516) 228-3565  
Fax: (516) 228-8475

MJM/CEA/mk